

Kevin H. Sharp

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)

v.)

JOSE NAVARRETE-BRAVO)

No. 3:14-00100-1
JUDGE SHARP

**MOTION FOR TRAVEL AND SUBSISTENCE COSTS
TO ATTEND DEPOSITIONS OF MATERIAL WITNESSES**

Jose Navarrete-Bravo, through counsel and pursuant to Rule 15(d) of the *Federal Rules of Criminal Procedure*, respectfully moves the Court to enter an order directing the United States Marshal's Service to pay for the reasonable travel expenses and subsistence costs so that he may attend the depositions of material witnesses which are scheduled to take place on August 14, 2014. Mr. Navarrete-Bravo would show as follows:

1. Counsel would show that on July 25, 2014, the government filed a notice to take depositions of material witnesses Antonio Tadeo Sontiso, EMBLH, (a juvenile), MHJTA (a juvenile) and JCVR (a juvenile). (D.E. 86). Contemporaneously with this motion, Mr. Navarrete-Bravo is filing a motion pursuant to Rule 15(c)(2) to allow him to be present during the taking of these depositions.

2. Mr. Navarrete-Bravo has been found to be indigent and has been provided with appointed counsel. (D.E. 19).

3. Fed. R. Crim. P., Rule 15(d), states:

(d) Expenses. If the deposition was requested by the government, the court may – or if the defendant is unable to bear the deposition expenses, the court must – order the government to pay:

(1) any reasonable travel and subsistence expenses of the defendant and the defendant's attorney to attend the deposition; and

(2) the costs of the deposition transcript.

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